

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FTX TRADING LTD., *et al.*,¹

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

**SECOND AMENDED² NOTICE OF AGENDA FOR HEARING SCHEDULED FOR
OCTOBER 7, 2024 AT 10:00 A.M. (ET), BEFORE THE HONORABLE JOHN T.
DORSEY AT THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT
OF DELAWARE, LOCATED AT 824 NORTH MARKET STREET, 5TH FLOOR,
COURTROOM NO. 5, WILMINGTON, DELAWARE 19801**

**ALL PARTICIPANTS, INCLUDING ATTORNEYS INTENDING
TO PRESENT AT THE HEARING AND WITNESSES, MUST BE PHYSICALLY
PRESENT IN THE COURTROOM. ANY NON-PARTICIPANT MAY OBSERVE
THE HEARING REMOTELY BY REGISTERING IN ADVANCE AT THE LINK BELOW
NO LATER THAN OCTOBER 4, 2024 AT 4:00 P.M. (ET).**

To attend this hearing remotely, please register using the [eCourt Appearances](#) tool on the
Court's website at www.deb.uscourts.gov.

RESOLVED MATTERS:

1. [Motion of LayerZero Labs Ltd., Ari Litan, and Skip & Goose LLC to Extend Voting and Preference Election Deadline Set Forth in Confirmation Scheduling Order \[D.I. 23161, filed on August 16, 2024\]](#)

Status: On September 4, 2024, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

2. [Debtors' Motion for Leave to Exceed Page Limit with respect to \(A\) Debtors' Memorandum of Law in Support of an Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization FTX Trading Ltd. and Its Debtor Affiliates and \(B\)](#)

¹ The last four digits of FTX Trading Ltd.'s FTX Trading Ltd.'s and Alameda Research LLC's tax identification number are 3288 and 4063 respectively. Due to the large number of debtor entities in these Chapter 11 cases, a complete list of the Debtors and the last four digits of their federal tax identification numbers is not provided herein. A complete list of such information may be obtained on the website of the Debtors' claims and noticing agent at <https://cases.ra.kroll.com/FTX>. The principal place of business of Debtor Emergent Fidelity Technologies Ltd is Unit 3B, Bryson's Commercial Complex, Friars Hill Road, St. John's, Antigua and Barbuda.

² **Amended items appear in bold.**

Debtors' Omnibus Reply to Plan Confirmation Objections [D.I. 26040, filed on September 30, 2024]

Status: On October 1, 2024, the Court entered an order granting the relief requested. Accordingly, a hearing regarding this matter is not required.

MATTERS GOING FORWARD:

3. [Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates \[D.I. 26029, filed on September 30, 2024\]](#)

Response Deadline: August 16, 2024 at 4:00 p.m. (ET); Extended for the U.S. Trustee to Aug. 23, 2024 at 4:00 p.m. (ET); the U.S. Dept. of Justice and the U.S. Securities & Exchange Commission to Aug. 30, 2024 at 4:00 p.m. (ET); and the New Jersey Bureau of Securities, Texas State Securities Board, Texas Dept. of Banking, State of Texas through the Consumer Protection Division of the Texas Attorney General, and the Wisconsin Dept. of Financial Information to Sept. 11, 2024 at 4:00 p.m. (ET)

Confirmation Responses Received: See **Exhibit A** attached hereto.

Related Documents:

- A. [Notice of Proposed Settlement of Customer Property Disputes \[D.I. 3291, filed on October 16, 2023\]](#)
- B. [Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates \[D.I. 4861, filed on December 16, 2023\]](#)
- C. [Disclosure Statement for Debtors' Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Affiliated Debtors and Debtors-in-Possession \[D.I. 4862, filed on December 16, 2023\]](#)
- D. [Order Granting Motion of Debtors to Estimate Claims Based on Digital Assets \[D.I. 7090, entered on February 7, 2024\]](#)
- E. [Notice of Filing of Official Committee Letter \[D.I. 18656, filed on June 24, 2024\]](#)
- F. [Order \(I\) Approving the Adequacy of the Disclosure Statement; \(II\) Approving Solicitation Packages; \(III\) Approving the Forms of Ballots; \(IV\) Establishing Voting, Solicitation and Tabulation Procedures; and \(V\) Establishing Notice and Objection Procedures for the Confirmation of the Plan \[D.I. 19068, entered on June 26, 2024\]](#)
- G. [\(SOLICITATION VERSION\) Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates \[D.I. 19139, filed on June 27, 2024\]](#)

- H. (SOLICITATION VERSION) Disclosure Statement for Debtors' Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Affiliated Debtors and Debtors-in-Possession [D.I. 19143, filed on June 27, 2024]
- I. Notice of Filing of Blackline of the Disclosure Statement [D.I. 19147, filed on June 27, 2024]
- J. Memorandum Opinion and Order Regarding Estimation of Digital Asset Claims [D.I. 19069, entered on June 26, 2024]
- K. Notice of Hearing to Consider Confirmation of Debtors' Joint Chapter 11 Plan of Reorganization [D.I. 19150, filed on June 27, 2024]
- L. (REDACTED) Notice of Filing of Plan Supplement [D.I. 22163, filed on August 2, 2024]
- M. (SEALED) Notice of Filing of Plan Supplement [D.I. 22164, filed on August 2, 2024]
- N. First Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 22165, filed on August 2, 2024]
- O. Notice of Filing of Blackline of First Amended Plan [D.I. 22166, filed on August 2, 2024]
- P. Certificate of Publication of James Daloia Regarding Notice of Deadline to Vote on, Deadline to Object to Confirmation of, and Hearing to Consider Confirmation of Debtors' Joint Chapter 11 Plan of Reorganization [D.I. 23987, filed on August 28, 2024]
- Q. Notice of (I) Executory Contracts and Unexpired Leases Proposed to be Assumed by the Debtors Pursuant to the Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates, (II) Cure Amounts, If Any, and (III) Related Procedures in Connection Therewith [D.I. 24029, filed on August 30, 2024]
- R. Affidavit/Declaration of Mailing of Ali Hamza Regarding Notice of (I) Executory Contracts and Unexpired Leases Proposed to Be Assumed by the Debtors Pursuant to the Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates, (II) Cure Amounts, If Any, and (III) Related Procedures in Connection Therewith [D.I. 24485, filed on September 10, 2024]
- S. Notice of Filing of First Amended Plan Supplement [D.I. 25649, filed on September 23, 2024]
- T. Notice of (I) Executory Contracts and Unexpired Leases Proposed to be Assumed by the Debtors Pursuant to the First Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and its Debtor Affiliates, (II) Cure Amounts,

if any, and (III) Related Procedures in Connection Therewith [D.I. 25650, filed on September 23, 2024]

- U. Notice of Filing of Blackline of Second Amended Plan [D.I. 26030, filed on September 30, 2024]
- V. Notice of Filing of Proposed Confirmation Order [D.I. 26034, filed on September 30, 2024]
- W. Debtors' Memorandum of Law in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 26035, filed on September 30, 2024]
- X. Debtors' Omnibus Reply to Objections to Confirmation of the Second Amended Joint Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 26039, filed on September 30, 2024]
- Y. Declaration of Steven P. Coverick in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 26041, filed on September 30, 2024]
- Z. Declaration of Rt. Hon. Lord Neuberger of Abbotsbury [D.I. 26042, filed on September 30, 2024]
- AA. Official Committee of Unsecured Creditors' Statement in Support of Confirmation of Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 26043, filed on September 30, 2024]
- BB. Declaration of Edgar W. Mosley II in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 26044, filed on September 30, 2024]
- CC. Declaration of James Daloia of Kroll Restructuring Administration LLC Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 26045, filed on September 30, 2024]
- DD. Statement of the Joint Official Liquidators of FTX Digital Markets Ltd. in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 26052, filed on September 30, 2024]
- EE. The Ad Hoc Committee of Non-US Customers of FTX.com's Statement in Support of Confirmation of the Debtors' First Amended Joint Chapter 11 Plan of Reorganization [D.I. 26059, filed on September 30, 2024]

- FF. Notice of Debtors' Exhibit List and Intent to Offer Witness Testimony at the Hearing on October 7, 2024 Regarding Confirmation of the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 26061, filed on October 1, 2024]
- GG. Order Granting Motion for Entry of an Order for Leave to Exceed Page Limit with Respect to (A) Debtors' Memorandum of Law in Support of an Order Confirming the Second Amended Joint Chapter 11 Plan of Reorganization FTX Trading Ltd. and Its Debtor Affiliates and (B) Debtors' Omnibus Reply to Plan Confirmation Objections [D.I. 26129, entered on October 1, 2024]
- HH. Statement of MDL No. 3076 Putative Class Representatives and Co-Lead Counsel in Conditional Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Reorganization of FTX Trading Ltd. and Its Debtor Affiliates [D.I. 26189, filed on October 2, 2024]
- II. Notice of Filing of Second Amended Plan Supplement [D.I. 26226, filed on October 3, 2024]
- JJ. Statement of the Adversary Class Action Plaintiffs Joining in the Debtors' Submission in Support of Confirmation of the Second Amended Joint Chapter 11 Plan of Reorganization [D.I. 26261, filed on October 3, 2024]
- KK. Notice of ELD Capital LLC Exhibit List for Confirmation Hearing [D.I. 26278, filed on October 4, 2024]
- LL. Notice of Filing of Revised Proposed Confirmation Order [D.I. 26309, filed on October 6, 2024]
- MM. Notice of Filing of Revised Proposed Confirmation Order [D.I. 26313, filed on October 7, 2024]**

Status: This matter is going forward.

- 4. The Celsius Litigation Administrator's Motion for Relief from the Automatic Stay [D.I. 16815, filed on June 5, 2024]

Response Deadline: June 18, 2024 at 4:00 p.m. (ET); extended to July 8, 2024 at 4:00 p.m. (ET) for the Debtors and FTX Digital Markets

Responses Received:

- A. Debtors' Objection to the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay [D.I. 19792, filed on July 8, 2024]

- B. [The Official Committee of Unsecured Creditors' Joinder to the Debtors' Objection to the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay \[D.I. 20291, filed on July 12, 2024\]](#)

Related Documents:

- A. [\[SEALED\] Declaration of Kenneth Ehrler in Support of the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay \[D.I. 16819, filed on June 5, 2024\]](#)
- B. [\[REDACTED\] Declaration of Kenneth Ehrler in Support of the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay \[D.I. 17181, filed on June 10, 2024\]](#)
- C. [Order Approving Tolling Agreement \[D.I. 19105, entered on June 27, 2024\]](#)
- D. [Amended Notice of Motion of the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay \[D.I. 19154, filed on June 28, 2024\]](#)
- E. [Debtors' Objection to Proofs of Claim Filed by Celsius Network LLC and Its Affiliated Debtors \[D.I. 19795, filed on July 8, 2024\]](#)
- F. [Amended Notice of Motion of the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay \[D.I. 20340, filed on July 12, 2024\]](#)
- G. [The Celsius Litigation Administrator's Reply in Further Support of the Motion for Relief from the Automatic Stay \[D.I. 24212, filed on September 4, 2024\]](#)
- H. [\[SEALED\] Notice Regarding Exhibits to Declaration of Kenneth Ehrler in Support of the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay \[D.I. 24318, filed on September 6, 2024\]](#)
- I. [\[REDACTED\] Notice Regarding Exhibits to Declaration of Kenneth Ehrler in Support of the Celsius Litigation Administrator's Motion for Relief from the Automatic Stay \[D.I. 24319, filed on September 6, 2024\]](#)
- J. [Joint Witness and Exhibit Lists of the Celsius Litigation Administrator and the Debtors \[D.I. 24587, filed on September 12, 2024\]](#)
- K. [Order Granting Celsius Litigation Administrator's Motion for Entry of an Order for Authority to File Under Seal the Transfer Schedules Containing Confidential Information \[D.I. 24659, entered on September 13, 2024\]](#)
- L. [Joint Witness and Exhibit Lists of the Celsius Litigation Administrator and the Debtors \[D.I. 26292, filed on October 4, 2024\]](#)

Status: This matter is going forward.

Dated: October 7, 2024
Wilmington, Delaware

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/s/ Matthew R. Pierce

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